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March 4, 2024

*Via CM/ECF only*

Hon. Rukhsanah L. Singh, U.S.M.J.  
United States District Court, District of New Jersey  
402 East State Street  
Trenton, New Jersey 08608

**Re: *Lovaglio v. Baston*, No. 3:23-cv-21803-GC-RLS**

Dear Judge Singh:

The parties write jointly to update the Court and request that the responsive-pleading deadline in this matter be held in abeyance until further order of the Court.

Over the past months, the parties have engaged in settlement discussions to try to resolve this dispute in good faith. Those discussions have been productive, and the parties plan to continue negotiating in the hopes of agreeing to a resolution that would ultimately obviate the need for further litigation.

Currently, Defendants' responsive-pleading deadline is March 5, 2024. *See* ECF 20. To give the parties more time to continue negotiations, and to conserve the Court's own resources, the parties therefore jointly ask that Defendants' responsive-pleading deadline be held in abeyance until further order of the Court. *See* Fed. R. Civ. P. 6(b)(1)(A), 12(a). In addition, the parties would welcome a status conference in approximately three months, or at the Court's convenience, to be able to provide a further update on how discussions have progressed.



The parties have attached a proposed consent order to this joint letter, and are happy to file a formal joint motion if the Court would prefer such.

We thank Your Honor for your consideration of this request.

Respectfully submitted,

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY

/s/ Jean Reilly  
Jean Reilly  
Assistant Attorney General

/s/ Michael R. Sarno  
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PASHMAN STEIN WALDER HAYDEN, P.C.

/s/ CJ Griffin  
CJ Griffin, Esq.  
*Co-counsel for Plaintiffs*

INSTITUTE FOR JUSTICE

/s/ Robert Frommer  
Robert Frommer, Esq.\*

/s/ Brian A. Morris  
Brian A. Morris, Esq.\*

*Co-counsel for Plaintiffs*  
*\*Pro Hac Vice Counsel*

cc: All counsel of record (via CM/ECF)

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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

HANNAH LOVAGLIO, J.L. and B.L.,  
by next friend, Hannah Lovaglio, *et al.*,

Plaintiffs,

v.

KAITLAN BASTON, *et al.*,

Defendants.

CIVIL ACTION NO.:  
3:23-cv-21803

**CONSENT ORDER TO STAY  
TIME FOR DEFENDANTS TO  
FILE A RESPONSIVE PLEADING**

This matter having been opened before the Court by Matthew J. Platkin, Attorney General of New Jersey, and Jean Reilly, Assistant Attorney General, and Michael R. Sarno, Deputy Attorney General, appearing on behalf of Defendants, Kaitlan Baston and Nancy Scotto-Rosato, in their official capacities, and C.J. Griffin, Esq., Robert Frommer, Esq. and Brian A. Morris, Esq. appearing on behalf

of Plaintiffs, for a Consent Order to stay or hold Defendants' responsive-pleading deadline in abeyance until further order of this Court,

IT IS on this \_\_\_\_\_ day of \_\_\_\_\_, 2024,

**ORDERED** that Defendants' time to answer, move or otherwise respond to the complaint is hereby stayed until further order of the Court.

By way of stipulation between counsel, we hereby consent to the form and entry of the within Order.

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY

/s/ Jean Reilly  
Jean Reilly  
Assistant Attorney General

/s/ Michael R. Sarno  
Michael R. Sarno  
Deputy Attorney General

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/s/ CJ Griffin  
CJ Griffin, Esq.  
*Co-counsel for Plaintiffs*  
INSTITUTE FOR JUSTICE

/s/ Robert Frommer  
Robert Frommer, Esq.\*

/s/ Brian A. Morris

Brian A. Morris, Esq.\*

*Co-counsel for Plaintiffs*

*\*Pro Hac Vice* Admissions

*It is so ordered.*

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